

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street, 10th Floor
New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Tamara Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge

March 10, 2025

BY ECF

Hon. Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

**RE: United States v. Edwin Medina-Guarache
25 Cr. 80 (LGS)**

Dear Judge Schofield:

The parties write jointly, in response to the Court's order dated March 7, 2025, to propose a scheduling order in the above-captioned matter.

Discovery. Rule 16 discovery in this case will consist primarily of immigration records and certain video and audio recordings depicting the defendant on the date of his arrest. The government will begin to produce discovery before March 14, 2025, and requests until March 21, 2025 to complete its production of any Rule 16 discovery in its possession, acknowledging its discovery obligations are continuing ones.

Motions and Conference Date. Because the defense is not yet able to evaluate how long it will take to review discovery and discuss the discovery with Mr. Medina-Guarache, a monolingual Spanish speaker who is incarcerated at MDC Brooklyn, the defense requests a conference in approximately 60 days. At that conference, the defense will inform the Court of its position on motions and propose a motions schedule if applicable. The parties are available for a conference on the morning of May 5, and all day on May 7, May 8, and May 9, 2025.

Speedy Trial Time. The government respectfully requests, with the consent of defense counsel, that the Court exclude time through the next-scheduled conference under the Speedy Trial Act to allow Mr. Medina-Guarache to receive and review discovery, to evaluate whether to file any pretrial motions, and for the parties to discuss a potential pretrial resolution of this case. *See* 18 U.S.C. § 3161(h)(7)(A).

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.

Counsel for Edwin Medina-Guarache

cc: Counsel of record

Application Granted in part. The Government shall produce any Rule 16 discovery in its possession by **March 21, 2025**. Defendant's motion(s), if any, shall be filed by **May 27, 2025**. The Government's opposition shall be filed by **June 10, 2025**. Defendant's reply shall be filed by **June 17, 2025**. The parties shall appear for a status conference on **July 14, 2025, at 10:30 a.m.** The Court finds that the ends of justice served by excluding the time between today and July 14, 2025, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because it will allow the parties time to produce and review discovery and for the Defendant to evaluate whether to file any pretrial motions and to file any such motions. It is hereby ORDERED that the time between today and July 14, 2025, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 8.

Dated: March 10, 2025
New York, New York


LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE